



## GOVERNMENT ACCOUNTABILITY PROJECT

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April 23, 2015

### VIA ONLINE REQUEST

U.S. Environmental Protection Agency  
Attention: Freedom of Information Act Officer

Re: FOIA Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. 552 and 45 C.F.R. Part 5, the Government Accountability Project (GAP) requests access to and copies of the information described below.

For the period 2013 to the present, all documents provided by the World Bank, any of the Bank's employees, and/or its contractors that pertain to the Bank's safeguard policies. Specific records could include, but would not be limited to:

1. All documents from or prepared by the World Bank that reference **"environmental and social Policy"** or **"environmental safeguards"** or **"climate change risks."**
2. All documents from or prepared by the World Bank that reference **"environmental standards"** or **"social standards"** or **"environmental and social standards."**
3. All documents from or prepared by the World Bank that reference **"The Review and Update of the World Bank's Safeguards Policies."**
4. All documents from or prepared by the World Bank that reference the **"Review and Update of the World Bank's Safeguard Policies—Proposed Environmental and Social Framework."**
5. All correspondence, of any nature, from 2013 to the present, between the World Bank Office of the Executive Director for the United States and the U.S. Environmental Protection Agency regarding environmental safeguard policies or safeguard policies.
6. All correspondence, of any nature, from 2013 to the present, between the World Bank and the U.S. Environmental Protection Agency regarding environmental safeguard policies or safeguard policies.

If any of the material covered by this request has been destroyed or removed, please provide all surrounding documentation including, but not limited to, a description of the action taken regarding the materials and justification for those actions taken. For any documents or portions you deny due to a specific FOIA exemption, please provide a detailed justification of your grounds for claiming such exemption, explaining why the exemption is relevant to the document or portion of the document withheld.

The Government Accountability Project requests that all fees incurred in connection with this request to the U.S. Environmental Protection Agency be waived, because “disclosure of the information is in the public interest and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552 (a)(4)(A)(iii).

### **The Requesters’ Public Interest Status and History**

GAP is a non-profit, non-partisan, public interest organization chartered under IRS Code §501 (C)(3) as a non-profit, educational and charitable organization. We seek to serve the public through achieving governmental and institutional accountability by protecting and encouraging international, federal and corporate employees who observe or are victimized by wrongdoing, gross waste of public funds, threats to public health and safety, environmental contamination, corruption, abuse of the public trust and other abuses of power.

GAP accomplishes these goals primarily by conducting advocacy campaigns before Congress, through the media, and for the general public and by providing legal representation to whistleblowers to combat the retaliation they have suffered in exercising their right of occupational free speech. Our twin aims are to promote corporate and government accountability and to expose, investigate, and correct substantive problems that formed the basis of protected whistleblowing disclosures. GAP’s role is well-recognized by the courts and, as an organization, has informational standing under the First Amendment protecting its receipt of disclosed information. *Taylor v. RTC*, 56 F.3d 1437 (D.C. Cir. 1995); *United States v. Garde*, 573 F. Supp. 604 (D.D.C. 1987); see, generally, *Virginia Pharmacy Bd. v. Virginia Consumer Council*, 425 U.S. 748, 756-57 (1976).

GAP has an approximately 40-year history of working in the public interest. GAP does not take individual cases based on the client’s ability to pay, how much money GAP believes it can recover in legal fees through litigation or any other commercial interest. Rather, GAP takes cases of legitimately harassed whistleblowers, often pro-bono (without charge), that further public policy or legislative changes that make the law stronger for workers who witness and choose to tell the truth about corporate and taxpayer-financed wrongdoing and to pursue exposure and resolution of the wrongdoing. It is through this work and with the help of whistleblowers that GAP has, among other things, pushed for enactment of several whistleblower protection statutes, exposed unhealthy food at supermarket chains, pushed for independent reviews of the safety of the Alaska pipeline, exposed the threat of explosion in waste tanks at the Hanford nuclear site, and pushed for policy reform within numerous executive agencies. All this activity is done primarily with the interest of the public in mind.

### **Dissemination of the Requested Information**

In our efforts to expose and eliminate fraud and illegality in the government and international institutions, GAP works closely with Members of Congress, the media, and the public to alert them to irregularities. The information requested will be used in connection with a campaign aimed at key decision-makers at the federal and international levels, the general public, and self-selected subscribers.

The combined circulation and viewer-base of our international, national, regional, and self-subscribed outlets ensure that the information will, indeed, be widely distributed to diverse segments of the public who will benefit from the legal disclosures requested above. As a consequence, public understanding and trust of government operations will certainly be enhanced.

#### **Non-commercial Use of the Requested Information**

Disclosure of this information by GAP is in no way connected with any commercial interest since GAP is a non-profit, tax-exempt organization under § 501 (c)(3) of the IRS Code. The information we seek is crucial to advancing public knowledge and will not be put to any commercial use.

Please be reminded that under the Freedom of Information Act, we are entitled to a response to this request within twenty working days (by May 21, 2015). Should this request be denied for any reason, we ask that a detailed explanation be provided along with the name of the person to whom administrative appeals should be addressed.

Thank you in advance for your assistance and cooperation. Please contact me if you would like to discuss this request or require any additional information.

Sincerely,



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